

H. Tim Hoffman (SBN 049141)  
Arthur W. Lazear (SBN 083603)  
Chad A. Saunders (SBN 257810)  
HOFFMAN & LAZEAR  
180 Grand Avenue, Suite 1550  
Oakland, California 94612  
Tel: 510.763.5700  
Fax: 510.835.1311  
Email: [cas@hoffmanandlazear.com](mailto:cas@hoffmanandlazear.com)

Newman Strawbridge (SBN 171360)  
LAW OFFICE OF NEWMAN  
STRAWBRIDGE  
719 Orchard Street  
Santa Rosa, CA 95404  
Tel: 707.523.3377  
  
Attorneys for Plaintiff  
MELISSA ARECHIGA

DAVID F. MCDOWELL (CA SBN 125806)  
DMcDowell@mofo.com  
MORRISON & FOERSTER LLP  
555 West Fifth Street, Suite 3500  
Los Angeles, California 90013  
Telephone: 213.892.5200  
Facsimile: 213.892.5454

TIFFANY CHEUNG (CA SBN 211497)  
TCheung@mofo.com  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000  
Facsimile: 415.268.7522  
Attorneys for Defendant  
TARGET CORPORATION

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MELISSA ARECHIGA, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

TARGET CORPORATION, and DOES 1  
through 50, inclusive,

Defendant.

Case No. 3:11-cv-00844-CRB

**CLASS ACTION**

**STIPULATION FOR DISMISSAL WITH  
PREJUDICE OF CLASS ACTION  
COMPLAINT AND FOR WAIVER OF  
FEES AND COSTS BY PLAINTIFF AND  
DEFENDANT**

Complaint Filed: February 23, 2011  
Trial Date: Not Set

1 TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 WHEREAS, plaintiff Melissa Arechiga ("Plaintiff") filed a complaint on February 23, 2011,  
3 alleging violations of California's Song-Beverly Credit Card Act (the "Action") against defendant  
4 Target Corp. ("Defendant," and with Plaintiff, the "Stipulating Parties"); and

5 WHEREAS, the Stipulating Parties have exchanged extensive informal discovery during the  
6 past several months, including Plaintiff's relevant credit card statements, Defendant's relevant  
7 policy and procedure documents, records of Plaintiff's relevant purchase transactions with  
8 Defendant, and declarations by one of Defendant's employees knowledgeable about the issues  
9 relevant to the Action; and

10 WHEREAS, Plaintiff believes that, if true, the information provided by Defendant thus far  
11 would likely defeat her claims asserted in the Complaint and that the costs of continuing to litigate  
12 this case are now higher than her likelihood of success; and

13 WHEREAS, no consideration, either direct or indirect, has been given in exchange for the  
14 dismissal with prejudice of the Action; and

15 WHEREAS, the Stipulating Parties have agreed to each bear their own attorneys' fees and  
16 costs related to the Action and its dismissal.

17 NOW, THEREFORE, the Stipulating Parties hereby stipulate and request that the Court  
18 approve this stipulated voluntary dismissal and dismiss the Action, and all causes of action alleged  
19 therein, with prejudice, as to all Defendants and order the Stipulating Parties to bear their own  
20 attorneys' fees and costs.

21 **IT IS SO STIPULATED.**

22 Dated: October 14, 2011

HOFFMAN & LAZEAR

23  
24 By /s/ Chad A. Saunders  
25 Chad A. Saunders  
26 Attorneys for Plaintiff Melissa Arechiga  
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1 Dated: October 14, 2011

MORRISON & FOERSTER LLP

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3 By /s/ Tiffany Cheung  
4 Tiffany Cheung  
5 Attorneys for Defendant TARGET CORP.  
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**PROPOSED ORDER**

The Court, having reviewed the above stipulation of the Stipulating Parties, HEREBY  
ORDERS THAT:

1. The action filed by plaintiff Melissa Arechiga entitled *Arechiga v. Target Corporation*, Case No. 3:11-cv-00844-CRB (the "Action"), is hereby voluntarily dismissed, with prejudice, in its entirety, including all causes of action therein, as to all defendants; and
2. The Stipulating Parties are to bear their own attorneys' fees and costs in connection with the Action and its dismissal.

**IT IS SO ORDERED.**

Dated: October 18, 2011

Hon. Charles R. Breyer  
United States District Court

